

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	3:18-CR-097
	:	
v.	:	(Judge Mariani)
	:	
ROSS ROGGIO	:	(Electronically Filed)

**MOTION FOR HEARING TO
MODIFY CONDITIONS OF PRETRIAL RELEASE**

AND NOW comes the Defendant, Ross Roggio, by his attorney Melinda C. Ghilardi, Assistant Federal Public Defender, and files the following Motion for Hearing to Modify Conditions of Pretrial Release. In support thereof, it is averred as follows:

1. On March 20, 2018, Ross Roggio was charged in an Indictment with conspiracy to commit an offense against the United States, in violation of 18 U.S.C. § 371; violations of the Arms Export Control Act, 22 U.S.C. § 2778(b) and (c); and the International Emergency Powers Act, 50 U.S.C. §§ 1702 and 1705(c); smuggling goods from the United States, in violation of 18 U.S.C. §§ 554 and 2; wire fraud, in violation of 18 U.S.C. § 1343; and money laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and 2.

2. On March 23, 2018, Mr. Roggio appeared before Magistrate Judge Karoline Mehalchick for an initial appearance and arraignment. The Federal Public

Defender was appointed to represent Mr. Roggio.

3. On April 3, 2018, Mr. Roggio was released on pretrial services supervision to include conditions of home detention with electronic monitoring and a restriction limiting travel to the Middle District of Pennsylvania.

4. On May 25, 2018, Mr. Roggio filed an unopposed motion to modify conditions of release to revisit the home detention with electronic monitoring portion of his release. This Honorable Court granted the motion on May 25, 2018.

5. Since his release, Mr. Roggio has abided by all of the terms and conditions of supervision.

6. Mr. Roggio has been unemployed since his arrest.

7. Mr. Roggio has an employment opportunity in international business that requires travel.

8. Mr. Roggio respectfully requests that this Honorable Court schedule a hearing on his request to modify the conditions of his pretrial release to permit international travel for employment purposes.

9. While the government concurs in Mr. Roggio's request for a hearing in this matter, the government opposes modifying the conditions of pretrial release to allow Mr. Roggio to travel internationally.

WHEREFORE, the Defendant, Ross Roggio, respectfully requests that this Honorable Court grant his Motion for Hearing to Modify Conditions of Pretrial Release.

Respectfully submitted,

Date: July 23, 2018

s/Melinda C. Ghilardi

Melinda C. Ghilardi

Assistant Federal Public Defender

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CERTIFICATE OF SERVICE

I, Melinda C. Ghilardi, Assistant Federal Public Defender, do hereby certify that this document, the foregoing **Motion for Hearing to Modify Conditions of Pretrial Release**, filed electronically through the ECF system will be sent to the registered Participants as identified on the Notice of Electronic Filing, including the following:

Todd K. Hinkley, Esquire
Assistant United States Attorney

and by placing the same in the United States Mail, first class in Scranton, Pennsylvania, addressed to the following:

Mr. Ross Roggio

Date: July 23, 2018

s/Melinda C. Ghilardi
Melinda C. Ghilardi
Assistant Federal Public Defender